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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MAXWELL V. PRITT
IN SUPPORT OF DEFENDANTS UBER
TECHNOLOGIES, INC.'S AND
OTTOMOTTO LLC'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
EXHIBITS TO THEIR OPPOSITION TO
WAYMO'S MOTION IN LIMINE NO. 18
TO PRECLUDE RELIANCE ON THE
STROZ FRIEDBERG DUE DILIGENCE
INVESTIGATION**

Judge: Hon. William H. Alsup
Trial Date: December 4, 2017

I, Maxwell V. Pritt, declare as follows:

1. I am counsel with the law firm Boies Schiller Flexner LLP, representing Defendants Uber Technologies Inc. and Ottomotto LLC (collectively, “Uber”) in this matter. I am a member in good standing of the Bar of the California, and I make this declaration in support of Uber’s Administrative Motion to File Under Seal Exhibits to Its Opposition to Waymo’s Motion in Limine No. 18 to Preclude Reliance on the Stroz Friedberg Due Diligence Investigation. I make this declaration based on personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein.

2. I have reviewed the following documents and confirm that only the portions identified below merit sealing:

| Document | Portions to Be Filed Under Seal | Designating Party |
|-----------------------------------------------------------|---------------------------------|-------------------|
| Exhibit 1 to the Declaration of Max Pritt (“Pritt Decl.”) | Entire Document | Plaintiff |
| Exhibit 2 to the Pritt Decl. | Entire Document | Plaintiff |
| Exhibit 3 to the Pritt Decl. | Entire Document | Plaintiff |
| Exhibit 4 to the Pritt Decl. | Entire Document | Plaintiff |
| Exhibit 5 to the Pritt Decl. | Entire Document | Plaintiff |
| Exhibit 6 to the Pritt Decl. | Entire Document | Plaintiff |
| Exhibit 7 to the Pritt Decl. | Entire Document | Plaintiff |
| Exhibit 8 to the Pritt Decl. | Entire Document | Plaintiff |

3. The entirety of Exhibits 1 through 8 contain information that Waymo considers or may consider “Confidential” and/or Highly Confidential – Attorneys’ Eyes Only” under the Protective Order, or that Waymo asked Uber to file under seal.

4. Exhibits 1 through 7 are excerpts of deposition transcripts and Exhibit 8 is Waymo’s Third Amended Witness List. Filing the entirety of deposition transcripts excerpts and witness list under seal is consistent with a protocol that the parties agreed upon and the Special Master entered on October 24, 2017, directing the parties to follow regarding confidentiality in this case.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 20th day of November, 2017, in Oakland, California.

Maxwell V. Pritt

I, Karen L. Dunn, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Maxwell V. Pritt has concurred in this filing.

Karen L. Dunn